



**Irathane  
Systems  
Incorporated**

US EPA RECORDS CENTER REGION 5



466135

Industrial Park • Hibbing, Minn. 55746 U.S.A. • Phone: 218/262-5211 Telex: 29-4446

**RECEIVED**

JUN 08 1981

**MINN. POLLUTION  
CONTROL AGENCY**

June 5, 1981

Mr. Mike Somers  
Minnesota Pollution Control Agency  
1935 W. County Road B2  
Roseville, Mn 55113

Dear Mike:

Due to changes in managerial practices, financial responsibilities and EPA regulations, Irathane Systems has made several changes in its disposal procedures for hazardous wastes. Enclosed are two tables which address these changes. Table #1 lists individually each waste stream and all applicable changes in disposal. Table #2 lists the changes in non-hazardous waste quantities from the table in the letter of Ken Podpeskar of March 12, 1981.

As was requested by Ken Podpeskar (June 4, 1981) the following description was written to advise MPCA of Irathane's efforts to "clean up the backyard" at each the north and south buildings.

- (1) 10,000 gallons of waste solvent have been segregated, sampled and are set for incineration in Chicago, Illinois.
- (2) 48 drums of solid non-hazardous resins have been segregated, checked and are planned for disposal at the Hibbing landfill.
- (3) 17 drums of liquid non-hazardous materials have been segregated, checked and will potentially be disposed of at the Hibbing Waste Disposal Plant.
- (4) Approximately 2375 gallons of polyurethane components have been individually mixed and reacted to form solid polyurethanes. This material is non-hazardous and intended for disposal at the Hibbing landfill.
- (5) Approximately 300 drums of solid polyurethane resulting from equipment flush have been checked, segregated and are intended for disposal at the Hibbing landfill. These drums now stored in the south yard, were previously stored at the north plant, and were not included in the table of March 12.

Due to modifications in equipment, the amount of solvent used during equipment flush has been reduced, causing the resulting material to cure and solidify, thus rendering it non-hazardous. An amended notification on this waste stream is enclosed.

Mike Somers  
Minnesota Pollution Control Agency  
June 5, 1981

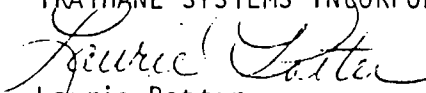
-2-

- (6) Approximately 300 drums of Irathane prepolymers have been checked and segregated as to the physical state before and after heating. Approximately 150 of these drums have been moisture cured, thus will not liquidify at temperatures up to 200°F, and as such are considered as non-hazardous wastes to be disposed of at the Hibbing landfill. The remaining 150 drums will be incinerated in Chicago due to liquidification at temperatures of 200°F. or below.
- (7) Approximately 40 - 2,5 gallon pails of 4,4' methylene-bis-2-chloroaniline have been crushed and placed in 7- (17-H type) D.O.T. approved drums as was suggested by U.S. Ecology. These pails either had residual present or were less than half full of this material. This procedure has been in effect since empty pails whose previous contents were MOCA are considered hazardous. You have asked that this procedure be halted until MPCA has okayed it. If the procedure is not okay, MPCA has the responsibility to provide Irathane with an alternate acceptable procedure.
- (8) Approximately 1500 miscellaneous drums are intended for reclamation or disposal as scrap metal. The following companies will accept these drums:

Worum Chemical	Solvent drums Some Resin drums	Reclamation
Consolidated	TDI/MDI Drums White prepolymer drums	"
Nashban	Drums in good condition Drums in bad condition	" Scrap waste

Irathane Systems has been working on the above cleanup activities full time since March 1981. We are making every effort to stay in compliance with MPCA/EPA regulations while keeping MPCA informed of Irathane's hazardous waste activities. Although we are attempting to clean up both back yards prior to June 20, 1981, it is likely that this deadline will not be met due to the delay of our company disposal request, the halting of all cleanup activities dealing with MOCA in addition to new regulations by EPA. With this in mind, Irathane will now adhere to July 20, 1981 as the extension date for compliance with MPCA regulations for facilities storage of hazardous wastes.

Sincerely,  
IRATHANE SYSTEMS INCORPORATED

  
Laurie Potter  
Environmental Consultant

LP:nb  
Enclosures

57LSHM 500X441NO1/2H1 10 500H L 30V 7H500S10 NI 30NHHD

MAN	THIUSPORTER	DISPOSE	PERMIT NO.	ALBURN INC	ENGINEERING	STORAGE	QUANTITY	Q
D-1	SET LIQUID WASTES 1L-D000810549	ALBURN INC	(1L) 03160031	ENGINEERING		10,000g (D-1,2,3)	18	
D-2	SET LIQUID WASTES 1L-D000810549	ALBURN INC	(1L) 03160031	ENGINEERING				SEE D#1
D-3	SET LIQUID WASTES 1L-D000810549	ALBURN INC	(1L) 03160031	ENGINEERING				SEE D#1
D-4	IRATHANE SYSTEMS 1L-D000810549	HIBING HANDFILE		NEUTRALIZATION	BURIAL			SEE #24
D-5	IRATHANE SYSTEMS	IRATHANE	HIBING HANDFILE	NEUTRALIZATION	BURIAL			SEE #24
D-6	IRATHANE SYSTEMS	IRATHANE	HIBING HANDFILE	NEUTRALIZATION	BURIAL			SEE #24
D-7	IRATHANE SYSTEMS	IRATHANE	HIBING HANDFILE	NEUTRALIZATION	BURIAL			SEE #24
D-8 *	IRATHANE SYSTEMS	HIBING HANDFILE		BURIAL				300 DRI
D-9	NASH DAN SYSTEMS	NASH DAN	GPS	REGISTRATION				30 CMPT DRY
D-10	WORKUM GHEM TR0014	US BIOLOGY	NT 330010000	BURIAL				100 DUMS
D-11	WORKUM GHEM TR0014	US BIOLOGY	NT 330010000	BURIAL				UNKNOWN
D-12	IRATHANE SYSTEMS	HIBING HANDFILE		BURIAL				0
D-13	IRATHANE SYSTEMS	IRATHANE		NEUTRALIZATION				SEE #24
D-14	IRATHANE SYSTEMS	HIBING HANDFILE		BURIAL				17 DRI (D-14,21)
D-15	IRATHANE SYSTEMS	HIBING HANDFILE		BURIAL				0
D-16		IRATHANE SYSTEMS		BURIAL				0
D-17	WORKUM GHEM TR0014	US BIOLOGY	NT 330010000	BURIAL				0
D-18	SET LIQUID WASTES 1L-D000810549	ALBURN INC	(1L) 03160031	ENGINEERING				SEE D#1

MIN D #	TRANSPORTER REG. NO	DISPOSER PERMIT NO	METHOD	CURRENT QUANTITY STORED
D-19	SET LIQUID WASTES IL-D000810549	ALBURN INC (14) 03100031	INCINERATION	130 FULL DRUM
D-20	SET LIQUID WASTES IL-D000810549	ALBURN INC (11) 03100031	INCINERATION	SEE #24 EMPTY DRUM
✓ D-21	IRATHANE SYSTEMS	HIBBING WASTE TREAT HIBBING LANDFILL	UNKNOWN (LIQ) OR BLACKIAL (SOLIDS)	SEE #14 (LIQ) 18 DRUMS (SOLIDS) SEE #22 (EMPTY DRUM)
✓ D-22	NASHBURN BARREL & CTR WORKING CHEM WORKING CHEM	NASHBURN BARREL & CTR WORKING CHEM US ECOLOGY	RECLAMATION	1500 EMPTY DRUMS, (2) 14, 19, 20, 21, 2
D-23	TROOIH	NVT 30010000	BURIAL	0
✓ D-24	IRATHANE SYSTEMS	HIBBING LANDFILL	BURIAL	150 DRUM 3375 gal (SOLID)
D-25	IRATHANE SYSTEMS	IRATHANE HIBBING LANDFILL	NEUTRALIZATION	SEE #24
D-26	IRATHANE SYSTEMS	IRATHANE HIBBING LANDFILL	BURIAL NEUTRALIZATION	SEE #24
* Disclosure #8				
b 7(c) - 7(d) - 7(e) - 7(f) - 7(g) - 7(h) - 7(i) - 7(j) - 7(k) - 7(l) - 7(m) - 7(n) - 7(o) - 7(p) - 7(q) - 7(r) - 7(s) - 7(t) - 7(u) - 7(v) - 7(w) - 7(x) - 7(y) - 7(z)				

Table #2  
Generation of Non-Hazard Waste at ISI

Item No.	MN D-No.	Description	Quantity Present @ Company	*Weekly Production
1.	9	TDI & TDI based prepolymer empty drums	20 empty drums	1
2.	9	MDI & MDI based prepolymer empty drums	20 empty drums	20 drums
3.	12	Rubber scraps - cured/uncured	0	200#
X	-	Office & lunchroom wastes	0	100 cu ft
5.	14	1,4BD wastes 1,4BD empty drums	17 full drums. See D#22 for empty drums	No wastes 2 drums
6.	-	Ethylene Glycol waste Ethylene empty drums	0 full drums 0 empty drums	1 drum
7.	22	Solvent drums empty	1500 empty drums (D#14,19,20,21,22)	6-10/wk
8.	15	Floor sweepings	0	See No. 10
9.	-	Lab solid wastes	0	45 cu ft
10.	24	Solid urethane pieces, pails, drums	150 drums 2375 gal. (solid)	72 cu ft
11.	21	Polyether resin Polyether empty drums	48 full (solid) drums. See D#14 for liquid drums. See D#22 for empty drums.	No waste 25 drums
12.	21	Polyester resin Polyester empty drums		No waste 5-10 drums
13.	-	Fiberboard boxes	0	See No. 10
14.	-	Empty silicon dioxide bags	0	12-18
15.	-	Empty pails of rubber adhesive	30 5 gallon pails	1 - 5 gal pail
16.	8	Equipment flush, solid urethane	300 drums	1 drum

\* Quantities on hand and produced weekly are strictly estimates.